

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Case No.: *[To be assigned]*

DECLARATION OF LANCE CALFE IN SUPPORT OF COMPLAINT

I, **Lance Calfe**, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct to the best of my knowledge:

Background

My name is Lance Calfe. I am over 18 years of age, competent to testify, and provide this statement based on my personal recollection of the events involving DeWitt Gilmore ("Plaintiff") and Sean Combs on the night in question.

Description of Events

On a night during the summer of 1996, I was with Plaintiff, DeWitt Gilmore, in New York City. After leaving a club, we were walking to Gilmore's Jeep, casually conversing and enjoying the night. Without warning, Sean Combs, also known as "Puff Daddy," pulled up beside us in a gold convertible with his bodyguard at the wheel.

Combs's demeanor was confrontational from the start, making intense eye contact with us and initiating a verbal confrontation by directing insulting language at Gilmore, including calling him derogatory terms such as, "What's up, b***h?" I sensed the situation escalating rapidly and felt a distinct unease about what might happen next.

Escalation and Threats of Violence

Gilmore attempted to defuse the situation, encouraging Combs to avoid negativity. However, Combs continued provoking him. When Gilmore responded, challenging Combs to settle it verbally, Combs instead instructed his driver to maneuver the vehicle behind us, where several additional cars arrived, blocking our exit and creating an intimidating, threatening scene.

Brandishing of Firearms and Escaping the Scene

As Combs's entourage surrounded us, his associates exited their vehicles. The tension reached a climax when I heard gunshots. My initial thought was that they were fireworks, but it became clear that firearms were being discharged. Acting instinctively, I shouted "Gun!" to alert Gilmore to the seriousness of the situation. Gilmore quickly reacted, starting the Jeep, and we fled through traffic in what felt like a life-or-death escape. The chase was chaotic, with Gilmore maneuvering through red lights and other vehicles as Combs's entourage pursued us, fully reinforcing my belief that we were in imminent danger.

Emotional and Lasting Impact

I have reflected on that night countless times over the years. It was not merely a brief conflict or power play; it was a deliberate, intense confrontation that appeared personal and life-threatening. After reconnecting with Gilmore recently, I fully realized how profoundly the event impacted both of us. Combs's actions left lasting emotional scars, reminding me of the volatility and danger that can arise when someone wields influence and is backed by an entourage. That night serves as a stark reminder of the traumatic experience, one that I will never forget.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: *November 3, 2024*

DATED: Sunday, November 3rd, 2024

Respectfully Submitted,



Lance Calfe